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UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 DURK BANKS,

17 aka "Lil Durk,"

18 aka "Mustafa Abdul Malak,"

aka "Blood,"

19 Defendant.

No. CR 24-621(B)-MWF-6

SUPPLEMENT TO THE GOVERNMENT'S
OPPOSITION TO DEFENDANT BANKS'
APPLICATION FOR RECONSIDERATION OF
DETENTION ORDER

Hearing Date: May 8, 2025

Courtroom: Hon. Patricia Donahue

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21 Plaintiff United States of America, by and through its counsel
22 of record, the United States Attorney for the Central District of
23 California and Assistant United States Attorneys Ian V. Yanniello,
24 Gregory W. Staples, and Daniel H. Weiner, hereby files this
25 supplement to its opposition to defendant's application seeking
26 reconsideration of this Court's detention order (Dkt. 140).

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1 This filing is based upon the attached memorandum of points and
2 authorities, the files and records in this case, and such further
3 evidence and argument as the Court may permit.

4 Dated: May 2, 2025

Respectfully submitted,

5 BILAL A. ESSAYLI
6 United States Attorney

7 LINDSEY GREER DOTSON
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9 /s/
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MEMORANDUM OF POINTS AND AUTHORITIES

On May 1, 2025, the grand jury returned a Second Superseding Indictment (the "SSI") charging defendant Banks and his co-conspirators with crimes arising from the August 2022 murder of S.R., including an additional charge of Stalking Resulting in Death, in violation of 18 U.S.C. §§ 2261A(2)(A), (B), 2261(b)(1).

Defendant Banks has presented a false narrative that he is being prosecuted and detained because of his violent lyrics. This claim is, and has always been, baseless. The SSI contains no allegations about defendant's lyrics. Instead, *just like every iteration of the indictment before it*, the SSI contains significant allegations that show defendant's alleged role in the execution-style murder of S.R. on a busy street corner in Los Angeles. These allegations and the other evidence the Court considered during defendant's December 2024 detention hearing leave no doubt that defendant is an ongoing danger to witnesses and the community, and a flight risk. He should remain detained pending trial.